



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

30 April 2026
EMA/106120/2026

Records of data processing activity for the declaration of gainful employment of staff members' spouses and registered partners (Public)

1.	Last update of this record, version number:	30 April 2026, Version 1		
2.	Reference number:	A-077		
3.	Name and contact details of controller:	European Medicines Agency Internally: the Head of Administration and Corporate Management Division Contact: datacontroller.administration@ema.europa.eu		
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu		
5.	Name and contact details of joint controller (where applicable)	N/A		
6.	Name and contact details of processors	Processor	Activity	Contact Details
		Open Text Coöperatief U.A.	Online storage of documents (Electronic Document and Records Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-the Netherlands DPO@opentext.com
		SAP Belgium – Systems, Applications and Products S.A.	Operation and Maintenance of EMA's Human Resource Information System (HRIS)	Hermeslaan 9, 1831 Diegem-Belgium privacy@sap.com
7.	Purpose of the processing	The purpose of this data processing activity is the fulfilment of the obligation of staff members to inform the Agency on the gainful employment of their spouses or registered partners, according to Article 13 of the Staff Regulations, in order for the Agency to assess whether there is an overall, inherent incompatibility with the functions undertaken by the staff member, leading to an increased risk that a conflict of interest may materialise.		



8.	Description of categories of persons whose data EMA processes and list of data categories	Staff members and third parties. Personal data may include the following: professional employment, including the area of the activity, job title, the name of the employer or self-employed status. Name and surname of the spouse or registered partner may be voluntarily included by the staff member, but they are not mandatory to provide.
9.	Time limit for keeping the data	8 years from the end of the year in which the declaration was created and submitted, or, in the event of a monitoring, audit or inspection, until its completion, whichever occurs later.
10.	Recipients of the data	Dedicated staff members responsible for handling administrative formalities on provided documentation and allowances. This may include on a need-to-know basis: hierarchical Line Managers, Deputy Executive Director, Executive Director and Assistants to Executive Director; the Executive Director; the Internal Audit Service; the Legal Department; the Data Protection Officer (DPO). Furthermore, we may share your personal data contained in your personal file with the following external institutions, on a need-to-know-basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law: - the European Ombudsman; - the Court of Justice of the EU; - the European Court of Auditors; - the European Anti-Fraud Office (OLAF); - the European Public Prosecutor's Office (EPPO) and - the European Data Protection Supervisor (EDPS).
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular, - Paper copies are stored in locked cabinets. Keys kept in safe and the code of safe is only available to Personnel Staff; - Electronic copies can be accessed only through personal password.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where	Details concerning the processing of your personal data are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema

	applicable), see the Data Protection Notice:	and in the specific Data Protection Notice for handling these declarations, available at the EMA Intranet.
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